

EXHIBIT A

CONFIDENTIAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Case No. 3:14-CV-03985-JD

TELESOCIAL INC.,

Plaintiff,

v.

ORANGE S.A., a French corporation,

ANNE BENRIKHI, an individual,

DIMITRI DELMAS, an individual,

OLIVIER GODINIAUX, an individual,

GUILLAUME GUIMOND, an individual,

FABRICE PETESCH, an individual,

JACQUES VIEL, an individual,

BARBARA BOBILLIER, an individual,

BENOIT AMET, an individual,

THOMAS LESENECHAL, an individual,

FLORIAN DE SA, an individual,

ANTOINE DECOUTTEUX,

and SYLVAIN JAUDRY, an individual,

Defendants.

C O N F I D E N T I A L

Videotaped Deposition of YLVA RAHM

On 30th of September, 2016 at 9:33 a.m.

Held at the offices of:

Quinn Emanuel Urquhart & Sullivan LLP

6 Rue Lamennais, 75008 Paris, France

Taken by AILSA WILLIAMS, Certified Court Reporter

Page 1

CONFIDENTIAL

1 everybody, but we didn't get to anywhere with 17:07
2 anybody until we had to stop working, for what 17:07
3 happened, and so that is my take on what happened 17:07
4 to the company. It was ruined by what happened. 17:07

5 Q. What prevented Telesocial from doing 17:07
6 a deal with US operators? 17:07

7 MR. MYRE: Object to form. 17:07

8 Q. Give me all the reasons? 17:07

9 A. As I said, I don't think anything 17:07
10 prevented us from doing anything, other than the 17:07
11 fact that we had somebody copy our idea and launch 17:07
12 it as their own, which made that idea already on 17:07
13 the market, although it wasn't, but we couldn't 17:07
14 sell it anymore, so we had no more business and 17:07
15 that is why we didn't sell it to anybody. It was 17:07
16 a great product. 17:08

17 Q. If it was a great product, why 17:08
18 didn't anyone buy it? 17:08

19 MR. MYRE: Object to form. 17:08

20 A. That is what I said. We had lots of 17:08
21 interest, we had genuine interest. To talk for 17:08
22 a month with a mobile operator means that there is 17:08
23 genuine interest. Otherwise nobody would take 17:08
24 their time and have several resources work -- 17:08
25 I worked for mobile operators, so I know exactly 17:08

Page 204

CONFIDENTIAL

1 the way they are structured and how they work and 17:08
2 what they decide to do. So if they would put 17:08
3 several resources to work on a project, whether it 17:08
4 is preparing for a trial or looking into 17:08
5 a potential partner or a possible project, it will 17:08
6 mean that they are seriously interested in it. 17:08
7 And if somebody does that for several months, it 17:08
8 confirms that they are very, very interested. So 17:08
9 I don't think that we did not make any deals 17:08
10 because we had a bad product. Quite the opposite. 17:08
11 If somebody wants to copy our technology, it means 17:09
12 that probably they have seen the value in it. So 17:09
13 I think that is one clear proof that we had found 17:09
14 something that was unique, a gap in the market. 17:09
15 Q. So if the idea was so great, what 17:09
16 prevented you from making a lot of money from that 17:09
17 idea? 17:09
18 MR. MYRE: Object to form. 17:09
19 A. I think, as I said, what prevented 17:09
20 us was really the fact that somebody stole our 17:09
21 idea and launched it as their own. So we had no 17:09
22 possibility of selling it anymore, marketing it 17:09
23 anymore. 17:09
24 Q. Is your answer complete? 17:09
25 A. Yes. 17:09

Page 205